

**PLEASE TAKE NOTICE** that, upon Plaintiff's Memorandum of Law in Opposition to Defendants Penmark Realty Corporation's and Terra Holdings, LLC's Motion for Summary Judgment and in Support of Plaintiff's Cross-Motion for Summary Judgment; the accompanying Counter-Statement of Facts Pursuant to Local Rule 56.1; and the Declaration of Lawrence M. Pearson ,and exhibits attached thereto, Plaintiff Diana Babayeva moves this Court, before the Honorable Ronnie Abrams, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and time to be designated by the Court, for an Order, pursuant to Fed. R. Civ. P. 56, granting Plaintiff's Cross-Motion for Summary Judgment and denying Defendants Penmark Realty Corporation's and Terra Holdings, LLC's Motion for Summary Judgment in its entirety, and for such other relief as the Court may deem just and proper.

Dated: June 30, 2017  
New York, New York

Respectfully submitted,

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By: 

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